

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SYMBOLOGY INNOVATIONS, LLC,**

**Plaintiff,**

**v.**

**AMERICAN AUTOMOBILE  
ASSOCIATION, INC.; AAA TEXAS, LLC,**

**Defendants.**

**CASE NO. 3:23-CV-02866-K**

**JOINT MOTION FOR DISMISSAL**

Under Federal Rule of Civil Procedure Rule 41(a)(1)(A)(ii), Symbology Innovations, LLC moves to dismiss its claims with prejudice, and Defendants American Automobile Association, Inc and AAA Texas, LLC collectively move to dismiss their counterclaims without prejudice, with each party bearing its own expenses, attorneys' fees, and costs.

Dated: June 26, 2024

Respectfully submitted,

/s/ Christopher A. Honea

Christopher A. Honea

Texas Bar No. 24059967

chonea@ghiplaw.com

M. Scott Fuller

Texas Bar No. 24036607

sfuller@ghiplaw.com

**GARTEISER HONEA, PLLC**

119 W. Ferguson Street

Tyler, Texas 75702

Telephone: (903) 705-7420

Facsimile: (888) 908-4400

**ATTORNEYS FOR PLAINTIFF  
SYMBOLOGY INNOVATIONS, LLC**

Dated: June 26, 2024

Respectfully submitted,

/s/ Alexander H. Martin

Neil J. McNabney

Texas Bar No. 24002583

Ricardo J. Bonilla

Texas Bar No. 24082704

Rodeen Talebi

Texas Bar No. 24103958

Sarika Patel

Texas Bar No. 24073520

Alexander H. Martin

Texas Bar No. 24091828

mcnabney@fr.com

rbonilla@fr.com

talebi@fr.com

patel@fr.com

martin@fr.com

**FISH & RICHARDSON P.C.**

1717 Main Street, Suite 5000

Dallas, Texas 75201

(214) 747-5070 (Telephone)

(214) 747-2091 (Facsimile)

**ATTORNEYS FOR DEFENDANTS**

**AMERICAN AUTOMOBILE ASSOCIATION,  
INC. and AAA TEXAS, LLC**

**CERTIFICATE OF CONFERENCE**

Pursuant to Northern District of Texas Local Rule 7.1, counsel has complied with the meet and confer requirement in Local Rule 7.1(a). Counsel for Defendants conferred with Counsel for Plaintiff concerning the relief sought in this Motion. Counsel for Plaintiff is not opposed.

/s/ Christopher A. Honea

Christopher A. Honea

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on this Wednesday, June 26, 2024.

/s/ Christopher A. Honea

Christopher A. Honea